

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

OLLIE GREENE, Individually as the surviving §
parent of WYNDELL GREENE, SR., §
WILLIAM GREENE, as the Administrator of §
the Estate of WYNDELL GREENE, SR., and §
MARILYN BURDETTE HARDEMAN, §
Individually and as the surviving parent of §
LAKEYSHA GREENE, §

Plaintiffs, §

v. §

TOYOTA MOTOR CORPORATION, §
TOYOTA MOTOR ENGINEERING & §
MANUFACTURING NORTH AMERICA, §
INC., TOYOTA MOTOR SALES USA, INC., §
VOLVO GROUP NORTH AMERICA, LLC., §
VOLVO TRUCKS NORTH AMERICA, A §
DIVISION OF VOLVO GROUP NORTH §
AMERICA, LLC., STRICK TRAILERS, LLC, §
JOHN FAYARD MOVING & WAREHOUSE, §
LLC, and DOLPHIN LINE, INC. §

Defendants. §

CAUSE NUMBER: 3:11-cv-0207-N

JURY TRIAL DEMANDED

**DEFENDANT JOHN FAYARD MOVING & WAREHOUSE, LLC'S
MOTION TO JOIN (JOINDER IN) VARIOUS MOTIONS FILED BY OTHER PARTIES**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant, **JOHN FAYARD MOVING & WAREHOUSE, LLC** (hereinafter, "Fayard Moving") files this Motion to Join (Joinder) Various Motions Filed by Other Parties, respectfully showing:

I. MOTION TO JOIN/JOINDER

1. The parties have filed a number of motions in which Fayard Moving desires to join. The purpose of this motion is for Fayard Moving to formally join in the substance of certain

motions filed by other parties and to ask the Court to grant the relief sought to Fayard Moving as well as the parties filing said motions.

2. Fayard Moving expressly joins in the following motions:

a. Defendants Toyota Motor Corporation, Toyota Motor Engineering & Manufacturing North America, Inc., and Toyota Motor Sales, U.S.A., Inc. (collectively, the “Toyota Defendants”) Responses and Objections to Plaintiffs’ Motion in Limine (Docket No. 728), with the exception of Toyota Defendants’ responses to Plaintiffs’ Motions in Limine Nos.: 10, 11, 15, 17, 18, 19, 20 and 21;

b. Toyota Defendants’ Motion to Exclude [All of Plaintiffs’ FEM, Alternatively to Exclude All of Plaintiffs’ Newly-Disclosed FEM, or Alternatively, Motion for Continuance (Docket #825);

c. Dolphin Line, Inc.’s Supplemental Objections to Plaintiffs’ Second Amended Exhibit List (Docket #828); and

d. Strick Trailer, LLC’s Emergency Motion to Exclude Expert Keith Friedman’s Opinions Regarding Underride Guards or, In the Alternative to Continue the Trial and Set Schedule for Further Deposition and Response by Defense Experts (Docket #830).

3. The purpose of this Joinder is for John Fayard to join in the substance of the foregoing motions and for the Court to grant the relief sought to John Fayard as well as the Toyota Defendants and Strick Trailer, LLC.

II. PRAYER

WHEREFORE, PREMISES CONSIDERED, defendant **JOHN FAYARD MOVING & WAREHOUSE, LLC** respectfully requests that the Court grant this motion to join; and joins Fayard Moving in the Motions identified above.

Respectfully submitted,

/s/ Scott W. Self

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ATTORNEYS FOR DEFENDANT

JOHN FAYARD MOVING &

WAREHOUSE, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 18, 2014, the foregoing Defendant John Fayard Moving & Warehouse, LLC's Motion to Join (Joinder In) Various Motions Filed By Other Parties was filed with the Clerk of the Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to all attorneys of record who have consented in writing to accept this Notice as service of documents by electronic means.

/s/ Scott W. Self

MICHAEL P. SHARP

SCOTT W. SELF